UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE: Jennifer Rogers Bergman, Debtor(s).	)))))	C/A No. 16-02250-DD Chapter 7
E. Perry Burrus, III and Lake Como, LLC, Plaintiffs, vs. Jennifer Rogers Bergmann, Defendant.	)))))))))))	ADV. PRO. 16-80113-DD **RULE TO SHOW CAUSE MOTION**

DEBTOR'S MOTION FOR RULE TO SHOW CAUSE

Ms. Bergmann, through her attorney, Michael Matthews, is informed and believes that the above named Plaintiff's have failed to comply with the terms of this Court's Order setting the deadline to exchange copies of trial exhibits dated July 7, 2017. The Order requires exhibits be exchanged by 4:30p.m. August 22, 2017.

On August 16, 2017, in follow-up to a previous attempt, undersigned contacted Plaintiff's counsel to discuss the Joint Pretrial Stipulation. Undersigned was abruptly informed by Mr. Twombley that the day prior he and Mr. Drose had "strategized" and decided that they would not cooperate or participate with undersigned in preparing joint submission of the Pretrial Stipulation unless undersigned sent them Defendants Joint Statement in advance. As a result, the parties filed separate Joint Statements.

On August 22, 2017, after the Joint Statements were due and exhibits were to be exchanged, counsel for Plaintiff's informed undersigned that they would not be exchanging exhibits pursuant to this Court's Order.

Ms. Bergmann hereby requests that this Court issue an Order to Appear and Show Cause why the Plaintiffs are not complying with this Court's Order and order any remedy this Court finds just and appropriate.

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WHEREFORE, the Debtor prays that the Court schedule a hearing to determine and issue an Order for just relief.

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Date: August 23, 2017

/s/ Michael Matthews
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Attorney for Debtor